

Caitlin J. Scott, Esq. (State Bar No. 310619)
AMERICAN LEMON LAW GROUP, LLP
6230 Wilshire Blvd., Suite 885
Los Angeles, CA 90048
Telephone: 877-707-0004
Facsimile: 213-900-7010
E-service: eservice@allgteam.com

Attorneys for Plaintiff, NANCY BELLEVILLE

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Nancy Belleville, an Individual
Plaintiff,

v.

PORSCHE CARS NORTH
AMERICA, INC., a Delaware
corporation, and DOES 1 through
20, inclusive,

Defendants.

Case No.: 2:25-cv-2631

[Los Angeles Superior Court Case No.
25NWCV00618]

**NOTICE OF MOTION
MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT OF
PLAINTIFFS' MOTION FOR
REMAND TO STATE COURT**

**DATE: May 29, 2025
TIME: 10:00 a.m
COURTROOM: First Street
Courthouse, Courtroom 5B**

**Action Filed: February 20, 2025
Trial Date: None**

**TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF
RECORD:**

PLEASE TAKE NOTICE, that on May 29, 2025, at **10:00 a.m.** or as soon
thereafter as counsel may be heard the Hon. Hernán D. Vera in Courtroom 5B of the
United States District Court, Central District Court, located at 350 W. 1st Street,

1 Courtroom 5B, 5th Floor, Los Angeles, California 90012, Plaintiff Nancy Belleville
2 (“Plaintiff”) will and hereby does move the court for an order remanding this action to
3 state court, specifically, the Los Angeles County Superior Court.

4 This Motion is made pursuant to 28 U.S.C. section 1447 because the removing
5 party has the burden of proving that removal is proper both substantively and
6 procedurally and, based upon the statements and evidence provided by Defendant
7 PORSCHE CARS NORTH AMERICA, INC. (“Defendant”), it does not appear that
8 Defendant can meet that burden.

9 This Motion is made following the conference of counsel pursuant to L.R. 7-3
10 which took place on April 10, 2025. The Parties disagreed on whether Defendant met
11 its burden of proof that removal was procedurally and substantively proper. (See, Scott
12 Decl. ¶ 5, Exhibit 1”).

13 This Motion is based upon this Notice, the attached Memorandum of Points and
14 Authorities, the attached Declaration of Caitlin J. Scott, all pleadings, records,
15 documents, and papers on file herein, and upon such oral argument and documentary
16 evidence as may be presented at the hearing of this Motion.

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22 **AMERICAN LEMON LAW**
23 **GROUP, LLP**

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25 Dated: April 25, 2025

/s/ Caitlin J. Scott

Caitlin J. Scott, Esq.

Attorney for Plaintiff Nancy Belleville